

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

**EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,**

**Plaintiff,**

**and**

**NAIDAISHA GASTON,**

**Plaintiff-Intervenor,**

**v.**

**CINERGY ENTERTAINMENT GROUP,  
INC.,**

**Defendant.**

**Civil Action No. 3:24-CV-00763**

**JOINT MOTION FOR ENTRY  
OF CONSENT DECREE**

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Plaintiff Equal Employment Opportunity Commission (“EEOC”), Defendant Cinergy Entertainment Group, Inc., and Intervenor Naidaisha Gaston, (collectively, “Parties”) move the Court to approve and enter the proposed Consent Decree attached as Exhibit 1 as the final judgment resolving this action. In support of this Motion, the Parties state:

1. The Parties have negotiated, resolved, and settled all matters at issue in this litigation, as evidenced by their signature on the proposed Consent Decree, which is attached as Exhibit 1.
2. The Parties believe the terms of this Consent Decree are adequate, fair, reasonable, equitable, and just.
3. The Consent Decree conforms to the Federal Rules of Civil Procedure and is not in derogation of the rights or privileges of any person.
4. The entry of this Consent Decree will further the objectives of Title VII and will be in the

best interests of the Parties and the public.

5. By entering into this Consent Decree, Cinergy Entertainment Group, Inc. does not admit any fault or violation of the law. Cinergy Entertainment Group, Inc. expressly denies any violation of the law.

WHEREFORE, the Parties respectfully request this Court approve and enter the Consent Decree and retain jurisdiction during the term of the Consent Decree to enforce the terms and conditions set forth therein.

This the 16<sup>th</sup> day of October, 2024.

Respectfully submitted,

COUNSEL FOR PLAINTIFF

COUNSEL FOR DEFENDANT

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